

Exhibit T

From: Eugene Hahm <ehahm@prangerlaw.com>
Sent: Friday, June 2, 2023 5:32 PM
To: Joseph Saltiel; Arthur Wellman; Nick Woloszczuk
Cc: Alex Bennett; Barry Irwin; BShelton@winston.com
Subject: RE: Repairify, Inc. v. Keystone Automotive Industries, Inc. et al, No. 21-cv-00819; Invalidity contentions

//EXTERNAL//

Joe,

We have reviewed Elitek's proposed amended invalidity contentions and do not believe Elitek has demonstrated sufficient good cause for the belated amendment. Specifically, we believe that many of the amendments are based on facts and existing law that have been available to Elitek for a long period of time, including prior to the service of its original Final Invalidity Contentions.

Eugene L. Hahm
Partner | Pranger Law PC
Tel +1 415-885-9800

From: Joseph Saltiel <jsaltiel@irwinip.com>
Sent: Thursday, June 1, 2023 6:14 PM
To: Arthur Wellman <AWellman@prangerlaw.com>; Eugene Hahm <ehahm@prangerlaw.com>; Nick Woloszczuk <nwoleszczuk@prangerlaw.com>
Cc: Alex Bennett <abennett@irwinip.com>; Barry Irwin <birwin@irwinip.com>; BShelton@winston.com
Subject: RE: Repairify, Inc. v. Keystone Automotive Industries, Inc. et al, No. 21-cv-00819; Invalidity contentions

[CAUTION: EXTERNAL EMAIL]

Arthur,

I write to follow up on the motion for leave to serve amended invalidity contentions, which we would like to file shortly. Please let us know if Repairify will oppose Elitek's motion.

Thank you,

Joe Saltiel
Irwin IP LLP

jsaltiel@irwinip.com
312-667-6283 – office
630-841-0512 – mobile

From: Joseph Saltiel <jsaltiel@irwinip.com>

Sent: Friday, May 26, 2023 4:26 PM

To: Arthur Wellman <AWellman@prangerlaw.com>; Eugene Hahm <ehahm@prangerlaw.com>; Nick Woloszczuk <nwoloszczuk@prangerlaw.com>

Cc: Alex Bennett <abennett@irwinip.com>; Barry Irwin <birwin@irwinip.com>; BShelton@winston.com

Subject: RE: Repairify, Inc. v. Keystone Automotive Industries, Inc. et al, No. 21-cv-00819; Invalidity contentions

Arthur,

To follow up on our discussion from Tuesday, we are attaching a redline of the second amended invalidity contentions showing changes from the amended invalidity contentions that we served in December. Also attached are a draft motion for leave and a proposed order.

Please let us know if Repairify agrees to submit this motion unopposed.

Thank you,

Joe Saltiel
Irwin IP LLP

jsaltiel@irwinip.com

312-667-6283 – office

630-841-0512 – mobile

From: Arthur Wellman <AWellman@prangerlaw.com>

Sent: Friday, May 19, 2023 5:16 PM

To: Joseph Saltiel <jsaltiel@irwinip.com>; Eugene Hahm <ehahm@prangerlaw.com>; Nick Woloszczuk <nwoloszczuk@prangerlaw.com>

Cc: Alex Bennett <abennett@irwinip.com>; Barry Irwin <birwin@irwinip.com>; BShelton@winston.com

Subject: RE: Repairify, Inc. v. Keystone Automotive Industries, Inc. et al, No. 21-cv-00819; Invalidity contentions

//EXTERNAL//

Hi, Joe,

Thank you very much for that; I think we can speak and see whether we can submit unopposed. I look forward to speaking with you,

Arthur

Arthur A. Wellman, Jr.

Partner | Pranger Law PC

88 Guy Place, Suite 405 | San Francisco, California 94105

Tel +1 415-885-9800 [Bio](#) | [VCard](#) | [LinkedIn](#)



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From: Joseph Saltiel <jsaltiel@irwinip.com>

Sent: Friday, May 19, 2023 3:07 PM

To: Arthur Wellman <AWellman@prangerlaw.com>; Eugene Hahm <ehahm@prangerlaw.com>; Nick Woloszczuk <nwoloszczuk@prangerlaw.com>

Cc: Alex Bennett <abennett@irwinip.com>; Barry Irwin <birwin@irwinip.com>; BShelton@winston.com

Subject: RE: Repairify, Inc. v. Keystone Automotive Industries, Inc. et al, No. 21-cv-00819; Invalidity contentions

[CAUTION: EXTERNAL EMAIL]

Arthur,

We do not intend to add new invalidity positions. Instead, we plan to amend our invalidity contentions to identify factual allegations that support our existing 112 allegations from recently produced discovery in this matter.

If you would like to discuss further, Tuesday at 12 pm PT / 2 pm CT would work for us.

Thank you,

Joe Saltiel
Irwin IP LLP

jsaltiel@irwinip.com
312-667-6283 – office
630-841-0512 – mobile

From: Arthur Wellman <AWellman@prangerlaw.com>

Sent: Friday, May 19, 2023 1:09 PM

To: Joseph Saltiel <jsaltiel@irwinip.com>; Eugene Hahm <ehahm@prangerlaw.com>; Nick Woloszczuk <nwoloszczuk@prangerlaw.com>

Cc: Alex Bennett <abennett@irwinip.com>; Barry Irwin <birwin@irwinip.com>; BShelton@winston.com

Subject: RE: Repairify, Inc. v. Keystone Automotive Industries, Inc. et al, No. 21-cv-00819; Invalidity contentions

//EXTERNAL//

Hi, Joe,

Thank you for this. We can be available Monday at 2 p.m. or thereafter, or Tuesday after 10 a.m. to 1 p.m. And again 2 p.m. and thereafter. All times PDT. Please let me know if something in there works for you all.

In the interim, if you want to send us something regarding the how and why, that might obviate a need to meet and confer and/or focus it. Of, of course, you can just raise it when we talk.

Please let me know. Thank you and have a pleasant weekend,
Arthur

Arthur A. Wellman, Jr.
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From: Joseph Saltiel <jsaltiel@irwinip.com>
Sent: Thursday, May 18, 2023 3:37 PM
To: Arthur Wellman <AWellman@prangerlaw.com>; Eugene Hahm <ehahm@prangerlaw.com>; Nick Woloszczuk <nwoloszczuk@prangerlaw.com>
Cc: Alex Bennett <abennett@irwinip.com>; Barry Irwin <birwin@irwinip.com>; BShelton@winston.com
Subject: Repairify, Inc. v. Keystone Automotive Industries, Inc. et al, No. 21-cv-00819; Invalidity contentions

[CAUTION: EXTERNAL EMAIL]

Counsel,

We are planning to file a motion to request leave to amend our invalidity contentions. Please let us know when you are available to meet and confer to discuss.

Best regards,

Joe Saltiel

Irwin IP LLP

Intellectual Property Litigation

150 N. Wacker Drive | Suite 700 | Chicago, IL 60606

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